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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LOUIS VUITTON MALLETTIER S.A.S.,

Plaintiff,

vs.

BOULEVARD VENTURES LLC; 2495
RIVIERA LLC; and DENNIS TROESH,
Defendants.

Case No. 2:24-cv-02015-RFB-BNW

**STIPULATED DISCOVERY PLAN
AND PROPOSED SCHEDULING
ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Pursuant to Fed. R. Civ. P. 26(f), LR 26-1(a), plaintiff Louis Vuitton
Malletier S.A.S. ("Louis Vuitton") and defendants Boulevard Ventures LLC, 2495

1 Riviera LLC and Dennis Troesch (together “Defendants”) (all collectively the
2 “Parties”) submit the following Stipulated Discovery Plan and Proposed Scheduling
3 Order:

4 **I. MEETING**

5 The Parties’ counsel met telephonically for a Fed. R. Civ. P. 26(f)
6 conference on January 15, 2025.

7 **II. INITIAL DISCLOSURES**

8 The Parties will make Fed. R. Civ. P. 26(a)(1) initial disclosures on or
9 before January 31, 2025.

10 **III. PROTECTIVE ORDER**

11 The Parties intend to seek a protective order under Fed. R. Civ. P 26(c)
12 to facilitate document production and disclosure, while protecting the Parties’
13 respective interests in their confidential information. The Parties will submit a
14 proposed protective order in a separate filing.

15 **IV. DISCOVERY PLAN**

16 The Parties jointly propose the following discovery plan:

17 **A. Discovery Cut-Off Date.**

18 The Parties propose that the discovery period run until August 1, 2025.
19 This exceeds the 180-day presumptive outside limit provided by LR 26-1(b)(1) for
20 completing discovery for the reasons explained in Section V below.

21 **B. Fed. R. Civ. P. 26(a) Disclosures (Experts).**

22 The parties propose that Fed. R. Civ. P. 26(a)(2) disclosures of experts
23 and expert reports proceed as follows:
24

1 1. All parties shall disclose initial experts and expert reports by June
2 2, 2025, which is 60 days before the discovery cut-off);

3 2. All parties shall disclose rebuttal experts and their reports by July
4 2, 2025, which is 30 days before the discovery cut-off;

5 **C. Amending the Pleadings and Adding Parties.**

6 The parties shall file any motions to amend the pleadings or to add
7 parties no later than May 1, 2025. This date is 90 days before the discovery cut-off.

8 **D. Dispositive Motions.**

9 The parties shall have until September 2, 2025 to file dispositive
10 motions. This date is 32 days after the discovery cut-off (the 30th day falls on the
11 Sunday of Labor Day weekend).

12 **E. Pretrial Disclosures/Order.**

13 The joint pretrial order shall be filed no later than October 2, 2025
14 unless a dispositive motion is filed in which case the joint pretrial order will be
15 suspended until 30 days after decision on the dispositive motions or further court
16 order.

17 **V. JUSTIFICATION FOR LONGER DISCOVERY PERIOD**

18 The parties believe the Court should permit a longer period for
19 discovery than what is provided in LR 26-1(b)(1) for several reasons. This is a case
20 based on claims of secondary trademark liability. The parties expect there may be
21 discovery directed to several third parties with respect to both the underlying
22 allegations of direct infringement, and claims and/or defenses concerning the
23 contributory liability claims. In addition, plaintiff expects that early discovery is
24 likely to lead to the identification of other parties that may need to be joined in the

1 case. The parties respectfully submit that the addition of roughly 90 additional days
2 to the discovery schedule is reasonable in view of the expected fact and expert
3 discovery in this case.

4 The parties submit that their proposed discovery plan is an efficient and
5 realistic schedule for completing the significant amount of discovery contemplated
6 in this case.

7 **VI. AGREEMENT FOR SERVICE OF DISCOVERY BY EMAIL**

8 The parties agree that, as permitted by Fed. R. Civ. P. 5(b)(2)(E), any
9 party may serve discovery disclosures, requests, responses, or notices on counsel for
10 the other parties in this case by email and that such email service will constitute
11 complete service under Fed. R. Civ. P. 5(b) so long as it is served by email on all
12 listed counsel of record.

13 This agreement will apply to any and all discovery made or requested
14 under Fed. R. Civ. P. 26, 27, 30, 31, 33, 34, 35, 36, and 45.

15 **VII. OTHER ISSUES**

16 **A. Alternative Dispute Resolution.**

17 The parties have conferred about the possibility of using alternative
18 dispute resolution processes. The parties agree this issue is best addressed after some
19 discovery has taken place.

20 **B. Alternative Forms of Case Disposition.**

21 The parties considered trial by magistrate judge and the use of the short
22 trial program. The parties do not consent to either at this time.

C. Electronic Evidence.

The parties have considered the possibility of presenting evidence to the jury in electronic format. In the event that any electronic evidence is submitted by either party, the parties understand that such evidence must be submitted in a format that is compatible with the Court's electronic jury evidence display system. The parties will consult the Court's website or contact the courtroom administrator for instructions about how to prepare evidence in a format that meets these requirements.

D. Court Conference.

The parties do not request a conference with the Court before entry of the scheduling order.

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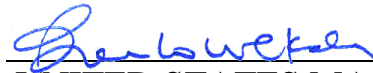
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Malletier S.A.S.

Louis Vuitton v. Boulevard Ventures, et al.
2:24-cv-02015-RFB-BNW

*Stipulated Discovery Plan and
Proposed Scheduling Order*

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 1/16/2025